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May 1, 2020

TO BE FILED UNDER SEAL

VIA ELECTRONIC MAIL

The Honorable P. Kevin Castel
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Mauricio Hernandez Pineda, et. al.; S4 15 Cr. 379 (PKC)

Dear Judge Castel:

I represent Mauricio Hernandez Pineda in the above referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A. Mr. Hernandez Pineda is named in an indictment that charges him and 1 other with conspiracy to import cocaine, possession of machine guns and destructive devices and conspiracy to possess machine guns and destructive devices. The purpose of this application is to respectfully request that the Court permit the appointment of associate counsel, Ms. Jennifer R. Louis-Jeune, to aid in reviewing discovery and preparing the defense case for trial. Given the seriousness of the charges in this case, and the voluminous amount of discovery, Ms. Louis-Jeune’s assistance in this matter is critical and important. We request the appointment be “*nunc pro tunc*” to the date he was indicted.

Ms. Louis-Jeune is a graduate of Fordham Law School. She has practiced criminal defense exclusively for over 10 years and has worked extensively with members of the Southern and Eastern District of New York CJA Panels. Ms. Louis-Jeune completed the Southern District’s Mentoring Program and was appointed to the CJA panel in the Eastern District of New York in 2019. Her resume is attached for the Court’s review.

Ms. Louis-Jeune will be able to assist in the review of the voluminous discovery, assist in the investigation of the allegations against Mr. Hernandez Pineda and engage in the preparation of any motions and trial.

I request the assistance of Ms. Louis-Jeune at the current CJA rate of \$152 per hour. I also request authorization for interim billing.

Respectfully submitted,



MICHAEL W. MARTIN



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New York, New York 10007
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BAR ADMISSIONS

- Dec. 2008* • State of New Jersey and District of New Jersey
June 2009 • State of New York, Southern District of New York and Eastern District of New York

EMPLOYMENT

FORDHAM UNIVERSITY SCHOOL OF LAW

New York, NY

2020 – present *Adjunct Professor and Co-Counsel to Lincoln Square Legal Services*

- Professor in the Federal Litigation Clinic.
- Supervising law students in the litigation of cases in federal civil, criminal and appellate courts.

LAW OFFICE OF JENNIFER R. LOUIS-JEUNE

New York, NY

2013 – present *Solo Practitioner*

- Practicing state and federal criminal defense in New York and New Jersey.
- Representing clients at all stages of criminal proceedings, from arraignment through sentencing phases.
- Associate counsel in federal trials in the Southern District of New York.

2019 – present *Assigned Counsel*, Eastern District of New York, Criminal Justice Act Panel

- Representing indigent defendants charged with federal crimes.

2016 – 2017 *Mentee*, Southern District of New York, Criminal Justice Act Mentoring Program

- Representing, alongside experienced federal practitioners, indigent defendants charged with federal crimes.

2015 – present *Assigned Counsel*, Westchester County 18B Panel

- Representing indigent defendants charged with New York State misdemeanors.

GOTTLIEB & JANEY, LLC.

New York, NY

2016 – 2017 *Associate*

- Senior attorney practicing state and federal criminal defense in New York and New Jersey.
- Managed a team of associate attorneys and paralegals in the criminal practice.

LAW OFFICES OF ADAM D. PERLMUTTER, P.C.

New York, NY

2009 – 2012 *Associate*

- Junior attorney for solo practitioner focused on the practice of federal and state criminal defense.
- Co-counsel and conducted cross-examinations in a federal criminal trial and state criminal trials.
- Compiled information from mitigation specialist and created mitigation submission in death eligible case.
- Filed civil rights complaints in SDNY and negotiated settlements.

ROBERT HALF INTERNATIONAL

New York, NY

2009 *Contract Attorney*

- Performed legal analysis for Bloomberg Law.

FORDHAM LAW SCHOOL

New York, NY

2008 – 2009 *Fellow, Sustainable Development Initiative*

- Worked with the Supreme Court of Ghana to research and draft a blueprint for judicial reform.

GEORGIA JUSTICE PROJECT

Atlanta, GA

Summer 2007 *Intern*

- Conducted preliminary hearing resulting in dismissal of case, interviewed clients and conducted legal research.

MATCHMAKERS 4 JUSTICE

New York, NY

Spring 2007 Volunteer

- Researched property succession laws and drafted judicial succession and heirship documents for Hurricane Katrina Victims.

NEW YORK COUNTY DISTRICT ATTORNEY'S OFFICE

New York, NY

Fall 2006 Intern, Child Abuse Bureau

- Drafted NY County Court waiver of appeal form, researched evidence requirements of Sex Offender Registration Act, drafted parole recommendation letters and investigated allegations of child abuse.

THE LEGAL AID SOCIETY

Bronx, NY

Summer 2006 Intern, Criminal Defense Division

- Developed case theories, drafted memorandums of law and motions, participated in client interviews and arraignments and conducted investigations with office investigators.

EDUCATION

May 2008 • Fordham University School of Law, Juris Doctor

New York, NY

May 2005 • Emory University, Bachelor of Arts in Psychology, Minor in Spanish

Atlanta, GA

LANGUAGES

Proficient Spanish speaker.